



NATIONAL ASSOCIATION OF THE DEAF

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September 14, 2001

Secretary
Federal Communications Commission
445 12th Street SW
Room TW-204B
Washington, DC 20554
(Filed electronically via the FCC website)

CC Docket No. 98-67

Comments on Requests for Temporary Waiver of Video Relay Service Requirements (DA No. 01-1706) (Docket 418-0484).

Dear Secretary,

The Commission issued a press release dated July 17, 2001, "Common Carrier Bureau Seeks Comment on Requests for Temporary Waiver of Video Relay Service Requirements" and later published the request for waivers in the *Federal Register* August 15, 2001 (vol. 66, no. 158, p. 42858).

The National Association of the Deaf (NAD), the nation's oldest and largest consumer based organization representing 28 million deaf and hard of hearing Americans, hereby files comments.

The NAD notes that Hamilton Telephone Company filed, on April 6, 2001, a "Request for Clarification and Temporary Waiver" and that Sprint Communications filed, on June 4, 2001, a "Petition for Temporary Waiver". In our comments, we consider these requests together.

The interests of the NAD and its constituencies are served when video relay service (VRS) evolves and becomes widely available. Because the Commission permits relay service operators, but does not require them, to offer video relay service, our interest is served when providers begin offering service and grow them over time. For this reason, the NAD has no objection to the specific waiver requests filed by Hamilton Telephone Company or to those filed by Sprint Communications. We believe that these providers seek to grow VRS. We have no reason to dispute their contentions that they will do so most efficaciously if granted the requested waivers.

Thank you for your consideration of this critically important matter.

Sincerely,

Nancy J. Bloch
Executive Director

cc: NAD Board of Directors